

Thank you for taking action on the important issue of ending the 21-year ban on community access to the airwaves. I have become increasingly concerned about the growing concentration of the media in the United States into fewer and fewer hands, and I am pleased that the Commission is responding to the demand to increase opportunities for local communities to use the radio airwaves, which rightfully belong to all of us.

De-"piratizing" low-power radio will restore a valuable part of our right to free speech that has been seriously missing since access to the media has become more and more difficult and expensive. It will help give back a sense of community that has disappeared.

I urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. Surely you agree that broad citizen access to information and culture is at the heart of a democratic society.

I also have the following concerns which I hope you will address:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.
5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.
6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.
7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.
8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.
9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly

encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Thank you for your willingness to address these issues.

Sincerely,
Roy Culver